

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

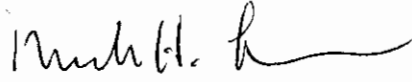
RICHARD MARINO,	:	
	:	
Plaintiff,	:	Case No. 07-cv-7726 (RJH)(DFE)
	:	
v.	:	ECF CASE
GLOBAL CAPITAL HOLDINGS MANAGEMENT, LLC and JOSEPH PALLADINO,	:	<u>MOTION FOR DEFAULT JUDGMENT</u>
	:	
Defendants.	:	
	:	
	:	
	:	

PLEASE TAKE NOTICE that pursuant to Rules 55 (a) and (b)(2) of the Federal Rules of Civil Procedure and Local Civil Rule 55.2(b), and upon the Clerk of the Court's Certificate of Default dated October 17, 2007, the Complaint in this Action dated August 28, 2007, the annexed Affidavit of Plaintiff Richard Marino ("Marino") sworn to on the 23rd day of October, 2007, the annexed Affidavit of Michael H. Levison, Esq. of Day Pitney LLP sworn to on the 31st day of October, 2007, the exhibits annexed thereto and the annexed proposed Default Judgment, Marino hereby moves this Court for an Order granting and entering (a) a Default Judgment in his favor and against Defendants Global Capital Holdings Management, LLC and Joseph Palladino, jointly and severally, in the amount of \$3,254,443.77, plus per diem interest of \$966.66 from and including October 20, 2007 through and including the date of entry of the Default Judgment, plus post-Default Judgment interest at 9% per annum and (b) such other and further relief as the Court may deem just and proper.

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